

K&L GATES

MEMORANDUM ENDORSED

January 13, 2025

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 1/16/2025

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

On behalf of Defendant Vadim Wolfson, I write to request a modification of Mr. Wolfson's conditions of release to permit him to periodically travel to the Eastern District of California for business purposes. Mr. Wolfson currently resides in the Central District of California.

Pretrial Services consents to this modification provided that Mr. Wolfson gives advance notice of travel and copies of his itinerary. The prosecution team also consents, provided that Mr. Wolfson, in addition to complying with the above request from Pretrial Services, agrees to seek Court approval for any trips that will last longer than five days. Mr. Wolfson agrees to these proposed conditions.

Respectfully submitted,

/s/ David Rybicki
David Rybicki

Counsel for Vadim Wolfson

Application granted. The conditions of Mr. Wolfson's pretrial release are modified as follows: Mr. Wolfson may travel to the Eastern District of California (the "EDCA") for business purposes, provided that he does not spend more than five days in the EDCA during any visit. Mr. Wolfson must provide his pretrial services officer a copy of his itinerary no less than two business days prior to any travel to the EDCA. All other conditions of Mr. Wolfson's pretrial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 98.

SO ORDERED.

Dated: January 15, 2025

New York, New York

K&L GATES LLP

1601 K STREET, N.W. WASHINGTON, DC 20006

T +1 202 778 9370 F +1 202 778 9100 klgates.com


GREGORY H. WOODS
United States District Judge